

The ADiCorp proposal, like its predecessors SafetyCast and Alertcast, is a well-intentioned but seriously flawed concept that should not be allowed by the FCC. Essentially what is proposed is a legal means by which existing AM and FM stations can be interfered with that provides little or no benefit to the majority of the intended users. In addition, it can and will seriously impair the ability of existing AM & FM radio stations to comply with Emergency Alert System (EAS) rules and requirements as EAS depends on stations being able to clearly receive signals from their Local Primary stations - which are nothing more than fellow AM & FM stations in the same area.

There would be little benefit to listeners as this system would affect ALL listeners, not just in-car listeners. Anyone except those people in a car would have their listening experience needlessly interrupted. In addition, this proposal does nothing for drivers listening to a cassette or CD player instead of the radio.

The proposal says it will reduce the interfering broadcast's power as the speed of the emergency vehicle decreases, but this still grossly underestimates the size of the interference zone. In order for the emergency vehicle's signal to be clearly receivable within a given radius, the radius where interference to existing stations will be present is MUCH larger, on the order of two or three times as big. Possibly big enough to measure in miles. This presents a serious hazard to existing radio transmissions.

Finally, ADiCorp's proposal to monitor EAS to prevent interference with EAS operations is incompatible with the recently-released "HD Radio" (aka I.B.O.C. or "Digital Radio") transmission systems as those transmissions are inherently delayed by several seconds. So any use by an ADiCorp-equipped vehicle could interfere with EAS operations before the system could even know that EAS operations were underway. Given the essential nature of EAS to provide a nationwide means of information dissemination by the President of the United States, no UNintentional interference can be allowed...much less INTentional interference by EVSS-equipped vehicles.